

IN THE UNITED STATES PATENT & TRADEMARK OFFICE

Application Number : 10/803,988 Confirmation No. 6900
Applicant : Sung Il KIM et al.
Filed : March 19, 2004
Tech Cntr/AU : 2613
Examiner : Phywai Lin
Entitled : OPTICAL TRANSCEIVER FOR REDUCING CROSSTALK
Attorney Reference : 123034-05004810
Customer Number : 22429

MAIL STOP AMENDMENT

Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

REQUEST FOR RECONSIDERATION

Dear Sir:

In reply to the Office Action dated October 11, 2007, reconsideration of the application is respectfully requested.

Claims 1, 3-6, and 8-20 stand rejected as obvious under 35 U.S.C. 103(a) over Applicant's Admitted Prior Art in view of U.S. Patent Application Publication No. 2002/0181853 to Ido et al. ("Ido") and U.S. Patent Application Publication No. 20020071641 to Nakanishi et al. ("Nakanishi"). This rejection is respectfully traversed.

First, the asserted combination of references, taken as a whole, does not suggest Applicants' claimed Optical Transceiver for Reducing Crosstalk. Second, the combined references do not teach or suggest all of Applicants' claim limitations. In addition, the grounds of rejection constitute an improper reconstruction of the claimed invention.

The Examiner appears to rely upon AAPA to disclose dummy ground lines, asserting that central ground line 1290 discloses dummy ground lines 2290 and 2295. The Examiner admits that the AAPA fails to disclose wherein the recited first and second dummy ground lines adjacent to, and spaced from, the high-speed signal lines of both the light transmitting device and

the light receiving device. The Examiner relies upon Ido to remedy the deficiencies of the AAPA. Applicants respectfully disagree.

The Examiner asserts that Ido discloses wherein the space between the high-speed signal line for the light transmitting device and the first dummy ground line (6-1) is less than or equal to the space between the high-speed signal line for the light transmitting device and the bias line (electrode pattern 3-11) for the light transmitting device, wherein the distance between microstrip line 3-9 with lead pin 6-2 and ground pin 6-1 is less than the distance between a microstrip line 3-9 with lead pin 6-2 and electrode pattern 3-11. Notwithstanding the assertions of the Examiner, Applicants respectfully submit that Ido fails to disclose dummy ground lines either on the substrate sub-mount 8 or on main body 2. Furthermore, not only do Applicants submit that ground pins 6-1 is not a dummy ground line, electrode pattern 3-11 fails to disclose a bias line, as recited in claim 1. Indeed, electrode pattern 3-11 is a ground for the light receiving device and therefore cannot correspond to any component of the light transmitting device, let alone the bias line for the light transmitting device.

Furthermore, because Ido fails to disclose any benefit of any special spacing between the leads, Applicants respectfully submit that the asserted combination of references is improper, and appears to be based on hindsight reasoning. Applicants respectfully submit that neither AAPA nor Ido suggest the desirability of combining such teachings. It is improper to use the claimed invention as an instruction manual to piece together the teachings of the prior art so that the claimed invention is rendered obvious. The Office Action appears to use improper hindsight reconstruction to pick and choose among isolated disclosures to suggest a special arrangement of the bias lines, the high-speed signals and the dummy grounds of the AAPA.

Because Ido fails to disclose dummy lines on the substrate; bias lines on the substrate; and further fails to disclose, teach, or suggest the specific arrangement between the high-speed signal lines, dummy ground lines, and bias lines, Ido cannot be relied upon to remedy the deficiencies of AAPA to render claim 1 obvious.

The Examiner further cites Nakanishi to disclose that when a metal shield plate is grounded to the ground pin, the ground pin can absorb electromagnetic noise. Notwithstanding

any disclosure of Nakanishi regarding the grounding of a metal shield, Applicants respectfully submit that Nakanishi fails to remedy the deficiencies of the AAPA and Ido as presented above.

Applicants respectfully submit, therefore that claim 1 is patentable not only due to the failure of the asserted combination of references to disclose, teach or motivate all recited features of the claims, but is also patentable based upon the improper combination of AAPA and Ido. Claim 2-6 and 8-20 depend from this independent claim and are likewise patentable over the asserted combination of references art for at least their dependence on an allowable base claim, as well as for the additional features they recite. Accordingly, withdrawal of this rejection is respectfully requested.

All objections and rejections have been addressed. In view of the foregoing, Applicants respectfully submit that the application is in condition for allowance and favorable reconsideration and prompt allowance of claims 1-6 and 8-20 are earnestly solicited.

The Examiner is invited to contact the undersigned at the telephone number set forth below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,
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